

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. CR-18-227-SLP
)	
JOSEPH MALDONADO-PASSAGE,)	
a/k/a Joseph Allen Maldonado,)	
a/k/a Joseph Allen Schreibvogel,)	
a/k/a “Joe Exotic,”)	
)	
Defendant.)	

**GOVERNMENT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S SENTENCING MEMORANDUM**

The United States respectfully requests that the Court enter an order extending the deadline to respond to Mr. Maldonado-Passage’s sentencing memorandum, which was filed on September 21, 2021. (Doc. 180.) Pursuant to the Local Criminal Rules, any response to the sentencing memorandum is due on October 5, 2021. *See* LCrR 32.2. An extension of 14 days to October 19, 2021, is requested.

Given the nature of the issues and allegations in the sentencing memorandum and accompanying affidavits, the United States requests a 14-day extension to provide adequate time to resolve certain issues that may affect its response. Counsel for the United States has conferred with Amy M.

Hanna, counsel for Mr. Maldonado-Passage, and she does not oppose this request.

Accordingly, counsel for the United States respectfully requests that the Court enter an order extending the deadline to respond to Mr. Maldonado-Passage's sentencing memorandum to October 19, 2021.

Respectfully submitted,

ROBERT J. TROESTER
Acting United States Attorney

s/ Charles W. Brown

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CERTIFICATE OF SERVICE

I certify that on September 30, 2021, I electronically filed this motion with the clerk of court for the U.S. District Court, Western District of Oklahoma, using the electronic case filing system of the court.

s/ Charles W. Brown

Charles W. Brown

Assistant United States Attorney